

STATUS OF THE IMPLEMENTATION OF
THE COMMON SENSE INITIATIVE RECOMMENDATIONS

Prepared by the US EPA Office of Policy and Reinvention - Updated October 1999

Sector:**Computers and Electronics****Recommendations:**

1. Enhanced Public Access
2. Consolidated Uniform Report for the Environment (CURE)
3. Basic On-Line Disaster and Emergency Response (BOLDER) System
4. Recordkeeping and Reporting Requirements Database
5. Performance Track Program
6. Cathode Ray Tube Recycling
7. Constructive Engagement
8. Worker and Environmental Health
9. Zero Wastewater Discharge

Recommendation	Agency Functions being tested	Program Office	Possible institutional mechanisms for change	Status /Key Dates
1. EPA's interpretations of its regulations should be made accessible and publicized to stakeholders.	Information management	Agency-wide Task Force chaired by OECA Anne Lassiter 202-564-2290	Sector-Based Action Plan	<p>The Task Force has now identified about 7000 documents, approximately half of which are in paper version only. The Agency is in the process of completing the development of metadata on all of these documents and converting the paper documents to electronic format. An extensive quality assurance effort will then be required to review the metadata and converted documents for accuracy. That quality assurance process has begun, and will go on for a number of months as new documents are fed into the system. The retrieval pages are still in draft and are not yet ready for testing as the contractor has been delayed. Testing of those pages is still several months away.</p> <p>The project will be moved into the new Information Office, and the next phase, the outreach effort, will be developed in coordination with that new office.</p> <p>This project is aimed at making Agency policy and guidance easily accessible to the public, particularly the regulated community, and as a matter of practice, EPA program offices will make newly issued policy available to the public via the Internet.</p>

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<p>2. The CURE guiding principles should be incorporated into the Agency's information management reforms by:</p> <ul style="list-style-type: none"> -tasking an EPA executive with building on the CURE process to achieve agency-wide integration of data content and reporting systems; -provide resources to involve external stakeholders in an organized fashion in the decision-making and implementation of this effort; -identifying how ongoing reporting and data access projects and programs will be managed in a coordinated manner that integrates data content, reporting requirements and access options. 	Information management	<p>OPPTS Chris Tirpak 202-260-7538</p>	<p>Environmental Data Registry</p> <p>New EPA Information Management Office</p>	<p>In October 1998, EPA announced the creation of a new Information Office that incorporates many of the CURE recommendations. The Texas Natural Resources Conservation Commission has developed the CURE process for improving the reporting requirements of the computers and electronics industry in TX. Stakeholder have identified key data elements to be included in a single reporting form, and they have developed a demonstration-scale prototype of the CURE system. Pilot tests have been conducted to test the use of the CURE prototype, including submission of and access to CURE data.</p> <p>The CURE has caught the interest of eight other states, who in March proposed to the EPA a cross-state initiative. This initiative was also discussed in Spring 1999 at an EPA-ECOS meeting in Washington, DC, and in Summer 1999 at an ECOS meeting in Minneapolis.</p> <p>The CURE report was released in March 1999, and it is located on the TNRCC Web site at www.tnrcc.state.tx.us/oprd/cure/index.html.</p>
<p>3. EPA should:</p> <ul style="list-style-type: none"> -recognize BOLDER as Phase 2 of the Integrated Contingency Plan; - take an active role in beta testing the BOLDER planning tool; - provide leadership in integrating BOLDER as a planning tool in the National Response Team's emergency planning and response system. 	<p>Information management</p> <p>Technical assistance</p>	<p>Warren Beer Region 9 415-744-1803</p> <p>OPPTS Chris Tirpak 202-260-7538</p> <p>Jim Staves Region 6 214- 665-6485</p>	Integrated Contingency Plan (One Plan)	<p>The goals of the BOLDER project include the following: consolidating the individual emergency response plans into a single form based on One Plan; making the form available for electronic filing; and providing real-time facility hazardous waste storage information. The workgroup has beta tested this with the Chemical Emergency Preparedness and Prevention Office in Corpus Christi, TX, and will explore electronic submission of the One Plan requirements. Continuing work with the National Response Team is needed to realize the full potential of BOLDER. For more information on BOLDER, visit the Web site at www.chemicalspill.org.</p>

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4. The Reporting and Recordkeeping Requirements Database should be continuously available on the Internet on the Printed Wiring Board Resource Center website.*	Reporting requirements	Mamie Miller OECA 202-564-2395 Steve Hoover OECA 202-564-7007	New EPA Information Management Office	TNRCC in Texas and CSI members have created a sector specific database listing all applicable Federal and Texas regulations that require recordkeeping or reporting. The database is available at www.pwbrc.org .
<p>Performance Track: 5a. EPA should pursue development of performance track programs to encourage sustained compliance, continuous improvement, pollution prevention, cost-effectiveness and collaboration processes.</p> <p>5b. A performance track program should, to the maximum extent possible, incorporate the conceptual components listed in the "Conceptual Components of a Performance Track Program."</p>	<p>Compliance Assistance</p> <p>Regulatory Development and Implementation</p>	<p>OPR Debbie Boger 202-260-1202</p> <p>Chuck Kent 202-260-2462</p>	Link to upcoming Incentives Program	The Office of Policy and Reinvention is convening an internal EPA workgroup to carry out the development of a "performance track." In its Innovations Task Force Report, <i>Aiming for Excellence</i> , EPA has committed to develop a performance track to motivate and reward top environmental performance. The workgroup will help develop an approach for EPA's performance track strategy. In doing so, the workgroup will be involved in a number of stakeholder discussions and will take those discussions into account when formulating options.

*The Agency's actions on this recommendation are complete.

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6.Revise RCRA regulations to facilitate CRT recycling.	Regulatory reform	OSW Javiera Garcia 703-308-2628 Charlotte Mooney 703-308-2075	RCRA Reform	<p>EPA expects to propose a rule in April 2000 that will greatly streamline the requirements for managing CRTs while retaining appropriate controls to protect human health and the environment. The rule will also clarify that once the CRT glass is processed, such that it is usable as a raw material in CRT glass manufacturing, it is not subject to hazardous waste regulations.</p> <p>This new streamlined approach will: prevent releases of lead into the environment through general performance standards and specific controls; require responses to any releases to the environment; prevent mixing lead glass with glass used in other applications; require appropriate management of hazardous residues generated in CRT reprocessing; provide safeguards for materials transportation; and ensure that communities are given the opportunity to become familiar with and comment on the activities of recycling operations. Through this effort, EPA will provide regulatory relief to this industry while increasing environmental protection.</p>
7. To encourage successful constructive engagement among stakeholders involved in the Computers and Electronics Sector, EPA should: publish, distribute, and periodically update a Resource Guide on Constructive Engagement; maintain and expand an active Internet Web site on constructive engagement; continue to provide leadership and resources for stakeholder involvement; and ensure that constructive engagement is part of CSI follow-up activities.*	Early planning for stakeholder involvement	OPPTS Judy Kendall 202-260-1802	Stakeholder Involvement Action Plan	<p>“The Constructive Engagement Resource Guide: Practical Advice for Dialogue Among Facilities, Workers, Communities and Regulators” was published in June 1999. It provides useful information to assist potential collaborators in determining whether or not to pursue constructive engagement and how to best approach constructive engagement processes. The guide is available on EPA’s Stakeholder Involvement Web site at www.epa.gov/stakeholders/pdf/resolve2.pdf. The document (EPA 745-B-99-008) also can be ordered free of charge from NSCEP either online at www.epa.gov/ncepihom or at 1-800-490-97-9198.</p>

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8. EPA, OSHA, and NIOSH should work together in an open process involving all stakeholders to minimize risk shifting between workers and the environment.	Interagency coordination on risk expose	OPPTS Matt Gillen 202-260-1801 John Bowser 202-260-1771	Joint Federal Agency Guidance on Protecting Workers and the Environment	An interagency planning group, working under the direction of the ONE (OSHA, NIOSH, EPA) Committee held a workshop on June 17-18, 1999, in Washington, DC to discuss "Common Sense Approaches to Protecting Workers and the Environment." The goal of the workshop was to improve and increase the coordination among the three Agencies (OSHA, NIOSH, and EPA) on occupational and environmental issues. The workshop was very successful, and over 200 people attended. The results of the meeting will be published on EPA's Web site at www.epa.gov/P2/workshop.htm . Future endeavors will be determined after the results have been compiled and the senior management of the three agencies has been briefed.
9. EPA should play a leadership role in clarifying the regulation of zero wastewater discharge systems under RCRA and CWA.	Regulatory Development	OSW Charlotte Mooney 703-308-7025 OW Mike Ebner 202-260-5397	RCRA & CWA Regulatory Changes	EPA Program and Regional offices and States are continuing to explore and assess alternative approaches toward addressing regulatory issues surrounding zero wastewater discharge systems. OSW/OW plan to include this issue in their FY 2000 budget process.

Sector: Iron and Steel

- Recommendations:**
- 1. National and Regional Liaisons**
 - 2. Early Stakeholder Involvement - analytical blueprint**
 - 3. Permit Improvements:**
 - a. public participation**
 - b. electric arc furnace**
 - c. non-witness test**
 - 4. NPDES Sampling Program**
 - 5. Computerized Permitting System**

Recommendation	Agency Functions being tested	Program Office	Possible institutional mechanisms for change	Status /Key Dates
1. Create National and Regional Liaisons to work with all iron and steel stakeholders in facilitating communication of information, transferring information about innovative technologies, and investigating regulations that are seemingly inconsistent or inefficient when applied to the iron and steel industry.*	Communications Technical assistance Regulatory/policy interpretation	OPR Bill Sonntag 202-260-0633 Region 5 Edward Wojciechowski 312-886-6785	Sector-Based Action Plan	The FY 2000 activities for the Iron and Steel Sector's liaisons will include: continued work on several regulatory issues such as effluent guidelines development process and up-coming MACT air emissions standards. The Iron and Steel Liaison evaluation report is complete, and it is available on the Sectors Web site at www.epa.gov/sectors/pdf/ironlia.pdf .
2. Solicit early stakeholder input to ensure meaningful stakeholder involvement in the regulatory and policy development processes.	Public involvement Regulatory/policy development	OPR Paul Lapsley 202-260-5480	Regulatory Steering Committee	EPA has conducted a stakeholder involvement in rulemaking survey and is assessing where improvements can be made. A Regulatory Steering Committee Workgroup has been formed to assist in the planning and implementation process.

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3a. Improve the permitting process to allow for greater public participation, improved communication, and timeliness of issuance. **	Permitting Monitoring Public Involvement	OPR Michele Aston 202-260-8767	Permit Reform Action Plan	The action plan for <i>Achieving The Next Generation in Environmental Permitting</i> (Permit Reform Action Plan) was approved by Deputy Administrator Peter Robertson on February 16, 1999. It is available on the Office of Reinvention's Web site at www.epa.gov/reinvent/permits . The Iron and Steel permitting recommendations have been built into the Cross Media Tasks in Matrix A of the Action Plan.
3b. Improve monitoring requirements by allowing more flexibility. ***	Monitoring	OAQPS Al Vervaert 919-541-5602 Kevin Cavender 919-541-2364	MACT Standard/New Source Performance Standards (NSPS)	The NSPS currently requires monitoring of furnace pressure by installing a pressure sensor in the furnace or in the duct connected to the furnace. Maintaining an operating sensor under these extreme temperatures is difficult. The NSPS will be amended to allow daily observations of visible emissions from the shop in conjunction with monitoring of primary and secondary emission control system parameters in lieu of internal furnace pressure. The amendments went into effect on May 3, 1999.
3c. Expand the acceptable range of test data to include non-witness tests.	Emissions Testing	OAQPS Robin Segall 919-541-0893 Mike Ciolek 919-541-4921	Guidance criteria for acceptable test standard	OAQPS has prepared draft guidance for assessing data from non-witnessed emission test programs at iron and steel facilities (conducted for purposes other than compliance). Internal and external Agency review has been completed, and the Agency expects to release the final document in November 1999.

**This text represents the summary of several specific recommendations made by the Iron and Steel Sector Subcommittee. These recommendations include: early participation in the permit process; improved notification process; public access to permitting information; location of public hearings; and the availability of an industry ombudsman to provide technical assistance to the public and to assist in resolving issues that delay permit issuance.

***The Agency's actions on this recommendation are complete.

Recommendation	Agency Functions being tested	Program Office	Possible institutional mechanisms for change	Status /Key Dates
4. Have EPA issue guidance to permit writers on effective NPDES sampling program.*	Permitting	OWM Chuck Sutfin 202-260-9545	Improved Permitting Techniques	<p>EPA has issued guidance through modifications to the Clean Water permitting regulations section in the US EPA NPDES Permit Writers' Manual, which can be found at www.epa.gov/owm/npdesup.htm. EPA is increasing the availability of the training course for state permit writers. As more permit writers are trained, it is expected that more effective effluent monitoring and sampling programs will be instituted addressing the concerns raised in the recommendation.</p> <p>In addition to guidance on monitoring frequency and location, the Manual and Training course provide instruction on sample collection methods. In the future, EPA plans to assess the extent to which states and EPA Regions are implementing provisions of the Agency's "Interim Guidance for Performance-Based Reductions of NPDES Permit Monitoring Frequencies." One provision of the Interim Guidance would allow reductions in effluent monitoring over and above those granted based on good performance if permittees agree to collect or provide additional ambient monitoring data.</p>
5. EPA should work with the states to develop computerized permitting systems accessible to the public.	Permitting	OW David Hair 202-260-0712	Computerized Permitting Programs	The Office of Water has begun an inventory of the existing computerized permitting programs. After it collects all the existing programs from the states, it will determine which of the available programs are useful. Based on this analysis, the Agency will determine whether the current available programs are sufficient, or if a new system needs to be developed.

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Sector: Automobile Manufacturing

Recommendations: 1. Mass per unit

2. Life Cycle Management

3. Alternative Regulatory System/Community Technical Assistance

Recommendation	Agency Functions being tested	Program Office	Possible institutional mechanisms for change	Status /Key Dates
1. EPA should evaluate the effectiveness of the mass per unit area approach for use in future rule and guidance development for total vehicle coating.	Analytical basis for regulation development	OAQPS David Salman 919-541-0859	MACT Standard	Rulemaking data collection was completed in May 1999. Several questions on vehicle surface area were included in the survey. The Agency is using this information along with VOC and HAP emissions data to evaluate the mass per unit area approach and compare it to other approaches. The schedule for this rulemaking proposal is by March 2001 and the final rulemaking by March 2002.
2. Consolidate and simplify environmental reporting requirements to enhance the protection of public health and the environment and to provide data more useful to Life Cycle Management.	Reporting Policy Development	OPR Ted Cochin 202-260-0880 OPPTS John Sparks 202-260-1682	Voluntary programs ISO 14000	Several EPA offices support work that falls into the broad area of life cycle management (LCM), such as OPPT's Environmental Accounting Project and Design for Environment. The Office of Policy and Reinvention (OPR) is facilitating Agency discussions on data needs to support LCM concepts and promote opportunities for its use. OPR in conjunction with DfE is currently investigating the potential of using LCM concepts in a Project XL application. DfE and OPR are co-funding a University of Tennessee LCM project with Saturn. The project is in the preliminary stage.
3. Explore ways to improve the viability, accessibility and usefulness of data resources.*	Information management	CEIS Brendan Doyle 202-260-2693	Coordination with information/data quality initiatives	The Center for Environmental Information and Statistics (CEIS) has posted the information from the sector's report on Auto plants and demographics on its website: www.epa.gov/ceis .

*The Agency's actions on this recommendation are complete.

Sector: Petroleum Refining
Recommendations: 1. Equipment Leaks Project

Recommendation	Agency Functions being tested	Program Office	Possible institutional mechanisms for change	Status /Key Dates
1. Test and utilize innovative technology to reduce emissions and enhance compliance at petroleum refineries.	Research and Development Technical Assistance	Region 6 Craig Weeks 214-665-7505 OSWER Steve Souders 703-308-8431	Greater use of technology at refineries.	The periodically poled lithium niobate (PPLN) laser imaging system prototype is under development with support from DOE and industry via the American Petroleum Institute. The system was field tested at a facility in Texas in April 1999. OAQPS is working on establishing a protocol for this technology if it is found to be a viable alternative to Method 21. A man-portable prototype is expected to be available in late 1999 and laboratory tested in early 2000 at Sandia National Laboratory in California. A refinery field test is expected to take place in April/May 2000. A pilot facility in Texas has been identified to participate.

Sector: Metal Finishing
Recommendations: 1. National Metal Finishing Strategic Goals Program
 2. National Environmental R&D Plan
 3. Access to Capital

Recommendation	Agency Functions being tested	Program Office	Possible institutional mechanisms for change	Status /Key Dates
1. Endorse and launch the Strategic Goals Program for the metal finishing industry; implement the program and all parts of its Action Plan nationwide by 2002.	<p>All functions:</p> <p>Regulatory flexibility</p> <p>Technical and compliance assistance</p> <p>Enforcement</p> <p>Research and development</p> <p>Permitting</p> <p>Information management</p> <p>Regulatory reform</p> <p>Sector-wide stewardship</p> <p>Public involvement</p>	<p>OPR Bob Benson 202-260-8668</p> <p>Mindy Gampel 202-260-2748</p> <p>Scott Dosick 202-260-9211</p>	<p>Creation and promotion of a voluntary industry wide stewardship model for regulated sectors.</p>	<p>The National Metal Finishing Strategic Goals Program (SGP) currently has over 300 companies, 18 states, and 50 POTWs participating in this sector-wide effort to achieve cleaner, cheaper, smarter results by the metal finishing industry. Many EPA programs and regions also are playing lead implementation roles.</p> <p>The voluntary beyond compliance performance targets for participating SGP facilities are for the year 2002. Starting in January 1998, EPA and its stakeholder partners have begun establishing SGP operations in locations nationwide, including developing program policies, providing outreach and marketing materials, and creating infrastructure to manage and analyze facility information. These local programs will provide assistance to SGP participant facilities, track and verify their progress toward the goals, and reward successful firms in the program. Regional implementation planning is underway now in Chicago, Los Angeles, New York, Providence, Boston, Indiana, Texas, and several other locations.</p> <p>EPA and other stakeholders also are pursuing national commitments made as part of the program. Recent milestones include a proposed RCRA rule change to extend (to 180 days) the accumulation requirement for F006 metal finishing waste (to promote on-site metals recovery). Other national commitments include specific compliance assistance and R&D projects for the sector. For more information visit the Web site at www.strategicgoals.org.</p>

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<p>2. Endorse a tailored, sector-specific research program for the metal finishing industry.</p> <p>(Note: Work on the R&D plan is done, but implementation of its strategic recommendations is ongoing)</p>	<p>Technical Assistance</p> <p>Research and development</p>	<p>ORD Dave Ferguson 513-569-7518</p>	<p>National R&D Plan</p>	<p>The National R&D Plan provides guidance to EPA, academia, industry, and other federal researchers on environmental R&D gaps within the metal finishing industry. ORD also has developed a risk screening tool (Characterizing Risk at Metal Finishing Facilities) and is providing grant support for hexavalent chromium risk reduction and the metal finishing P2 verification pilot project.</p> <p>Note that the peer reviewed fume suppressant technology has led to a recommended change in chrome MACT standards to allow for the use of this low cost P2 technology by metal finishers (small businesses).</p>
<p>3. Develop an EPA/SBA sponsored pilot loan program to help small metal finishers fund facility improvement.</p>	<p>Technical Assistance</p> <p>Public Involvement</p> <p>Pollution Prevention</p>	<p>OPR Scott Dosick 260-9211</p> <p>Region 9 Laura Bloch 415-744-2279</p>	<p>Pilot program with Small Business Administration</p>	<p>Office of Policy awarded a grant to the Region 9 Environmental Finance Center to facilitate meetings and perform analysis for a local multi-stakeholder group that will develop loan criteria and a loan review board for this pilot program with SBA. Stakeholder planning meetings have occurred throughout the first two quarters of FY-99 to develop the pilot loan program for metal finishers in the Los Angeles area.</p> <p>Current plans anticipate a \$2-3 million small business loan program that would be piloted in the Fall of 1999. Long-term plans call for replication of this model in other SGP areas (and perhaps with other small business sectors).</p>

CSI Council

- Recommendations:**
- 1. Reinventing Environmental Information**
 - 2. Sector-Based Action Plan**
 - 3. Stakeholder Involvement Recommendations**
 - a. Use Common Vocabulary**
 - b. Use Analytical Tools**
 - c. Establish Internal Coordinating Mechanisms**
 - 4. Data Gaps**
 - 5. Data Quality**

Recommendation	Agency Functions being tested	Program Office	Possible institutional mechanisms for change	Status /Key Dates
1. The Agency needs to take steps to reduce the environmental information burden while improving public access to information and the efficiency of how it manages environmental information.	Dissemination of Environmental Information	New Information Office Barbara Chancey 202-260-247	REI Action Plan	The Reinventing Environmental Information Action Plan was approved by Administrator Browner in February 1998. Through REI, EPA is adopting formal data standards, providing universal access to electronic reporting, reengineering its nation data systems, and working more cooperatively on information reforms with the states. The Action Plan is available on the Internet at www.epa.gov/rei .
2. Develop a Sector-Based Action Plan to ensure that sector strategies, where appropriate, are incorporated into the core functions of the Agency.	Sector Strategies	OPR Andy Teplitzky 202-260-4088	Permitting, rulemaking, enforcement and compliance, and research	The Sector-Based Action Plan was endorsed by the CSI Council on October 14, 1998. The Plan presents a multi-year strategy that the Agency will use to encourage a sector approach. Included in the Plan was the creation of the NACEPT Standing Committee on Sectors, which met for the first time April 15-16, 1999, and has had two subsequent meeting in the summer and fall respectively. The new Standing Committee on Sectors is assisting with the development of the FY 2000 Sector-Based Action Plan.

Recommendation	Agency Functions being tested	Program Office	Possible institutional mechanisms for change	Status /Key Dates
<p>3.Stakeholder Involvement Action Plan:</p> <p>a. Use common vocabulary to describe the terminology associated with stakeholder involvement, and use the Typology of Stakeholder Involvement Techniques as a guide for stakeholder involvement.</p> <p>b. Expand the use of analytical tools to integrate stakeholder involvement and decision-making.</p> <p>c. Establish internal coordinating mechanisms to ensure EPA employees receive stakeholder involvement guidance and/or manuals in the following areas: different types of stakeholder involvement, analytical tools, techniques guides, and program-specific guides.</p>	Stakeholder Involvement	OPR Kathleen Bailey 202-260-3413	Principles for stakeholder involvement, staff networks, Intranet/Internet Web sites, guidance manuals, staff training, databases	A 20-point Stakeholder Action Plan has been developed as a result of the three specific recommendations of the Council on expanded stakeholder involvement. The Plan, dated December 1, 1998, plus updates on specific action items are available on EPA's Web site at www.epa.gov/stakeholders .

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4. The Agency needs to address data gaps issues in order to ensure that decision makers have complete information with which to make informed and correct decisions	Data Gaps	New Information Office Doreen Sterling 202-260-2766	Data Gaps Strategy	From the Spring to the Fall of 1998, the CSI Council provided advice and recommendations to EPA on the various issues related to data gaps. The Council also promoted intensive analysis of data gaps for individual environmental issues. EPA's leadership had also identified the need for better information on data gaps in order to help set priorities in the agency's planning and budgeting process. As a result of the CSI Council's proposals, in December 1998, EPA issued a preliminary report on its strategy to address data gaps. The report presents a mechanism for early public involvement in addressing data gap issues. The report also presents a strategic approach for identifying, setting priorities for, and addressing data gaps.
5. The Agency needs to address data quality issues to ensure that decision makers have accurate information with which to make informed and correct decisions	Data Quality	New Information Office Carolyn Sanders 202-260-8298 John Adams 202-260-3632 703-549-6308	Data Quality Strategic Plan	From the Spring through the Fall of 1998, the CSI Council provided advice and recommendations to EPA on the various issues related to data quality. All of the CSI Council recommendations were integrated into the final draft of the Data Quality Strategic Plan that was submitted to the EPA Administrator in late December 1998. It commits the Agency to improving data quality in three ways: 1) by developing quality performance standards for each of its major data systems to track and improve data quality over time, 2) by developing an error correction process to ensure that discrepancies in data are routed to the appropriate data managers, and 3) by establishing customer service performance standards for each major data source to ensure that discrepancies are addressed promptly and appropriately.

Acronyms

API	American Petroleum Institute
BOLDER	Basic On-Line Disaster and Emergency Response
CEIS	Center for Environmental Information and Statistics
CRT	Cathode Ray Tube
CSI	Common Sense Initiative
CURE	Consolidated Uniform Report for the Environment
CWA	Clean Water Act
DOE	Department of Energy
ECOS	Environmental Council of States
EPA	Environmental Protection Agency
F006	Metal Plating Waste Water Sludge
HAP	Hazardous Air Pollutant
IRM	Information Resources Management
ISO	International Organization of Standards
LCM	Life Cycle Management
MACT	Maximum Achievable Control Technology
NACEPT	National Advisory Committee on Environmental Policy and Technology
NIOSH	National Institute for Occupational Safety and Health
NPDES	National Pollutant Discharge Elimination System
NSPS	New Source Performance Standards
OAQPS	Office of Air Quality Planning and Standards
OECA	Office of Enforcement and Compliance Assurance
OIRM	Office of Information Resources Management
OPR	Office of Policy and Reinvention
OPPTS	Office of Prevention, Pesticides, and Toxic Substances
ORD	Office of Research and Development
OSHA	Occupational Safety and Health Administration
OSWER	Office of Solid Waste and Emergency Response
OWM	Office of Wastewater Management
P2	Pollution Prevention
POTW	Publicly Owned Treatment Works
PPLN	Periodically Poled Lithium Niobate
R&D	Research and Development
RCRA	Research Conservation and Recovery Act
REI	Reinventing Environmental Information
SBA	Small Business Association
STAPPA/ALAPCO	State and Territorial Air Pollution Program Administration/Association of Local Air Pollution Control Officials
TNRCC	Texas Natural Resources Conservation Commission
VOC	Volatile Organic Compound